

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CIRIACO PUCILLO
Plaintiff

v.

VALMET CONVERTING, INC., ATLAS)
CONVERTING EQUIPMENT)
LIMITED, f/k/a VALMET ATLAS PLC,)
f/k/a ATLAS GROUP AMERICAS LTD,)
ATLAS GROUP AMERICAS f/k/a)
ATLAS CONVERTING EQUIPMENT,)
AND BOBST GROUP SA d/b/a BOBST)
GROUP USA INC.)
Defendants

C.A. NO. 03-CV-12359 MLW

PLAINTIFF'S RENEWED MOTION TO AMEND THE COMPLAINT

Now comes the Plaintiff, Ciriaco Pucillo, and respectfully requests that this Honorable Court grant him leave to file the attached Amended Complaint, pursuant to Fed.R.Civ.Pr. 15.

As grounds therefore, the Plaintiff states that discovery has revealed an evidentiary basis to add additional Defendants, and additional claims against the Defendant, Valmet Converting, Inc., as more fully set forth in the attached Memorandum in Support of Plaintiff's Motion to Amend Complaint.

Respectfully Submitted,

/s/ Maureen Counihan
Maureen Counihan, Esq. (B.B.O. #549098)
Law Offices of Maureen Counihan, P.C.
67 South Bedford Street
Suite 400 West
Burlington, MA 01803
(781) 229-5884

Attorney For Plaintiff Ciriaco Pucillo

Dated: June 30, 2006